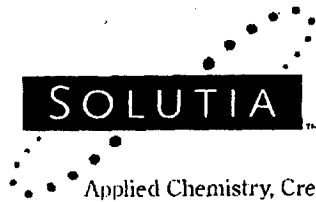


201-14303



Solutia Inc  
575 Maryville Centre Drive  
St. Louis, Missouri 63141

P.O. Box 66760  
St. Louis, Missouri 63166-6760  
Tel 314-674-1000

February 14, 2003

Ms. Christine Whitman  
Administrator  
U.S. Environmental Protection Agency  
PO Box 1473  
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

In re: HPV Chemicals Challenge  
Company Registration Number  
CAS Number: 68514-80-7

06 SEP 29 PM 2:37

Dear Administrator Whitman,

Solutia Inc has committed to providing HPV Chemicals Challenge dossiers for all of the chemicals we manufacture at rates above one million pounds per year for TSCA regulated purposes. As we began implementation of the final phase of dossier preparation to be concluded as 2003 submissions, we reviewed our previous commitments and determined that a clarification is necessary.

We have determined that it is not appropriate for us to provide an HPV Chemicals Challenge dossier for the following chemical:

CAS Registry Number 68514-80-7  
Polyphenyls, biphenyl and terphenyl free-

We are therefore withdrawing our commitment for this UVCB chemical entity; the basis for this decision is as follows:

This UVCB entity is a chemical process waste stream used as a fuel source and has no current commercial purpose. Further, we anticipate no commercial use for this stream in the foreseeable future. The definition of how we manufacture and dispose of this stream is consistent with the definition of a byproduct that is excluded from the TSCA Inventory according to 40CFR710.4(d)(2). We have, however, historically reported manufacture of this stream (in excess of 1M pounds per year) in our Inventory Update Reports, an action that is consistent with the notation at 40CFR710.4(d)(2) that stipulates such substances may be reported for the Inventory.

UVCB CAS Registry Number 68514-80-7 represents a distillation residue stream from our manufacture of polyphenyl products. The primary product streams from this production unit will be the subjects of Solutia's HPV Chemicals Challenge submissions in 2003, as per our original agreement. The entirety of this distillation residue is burned as a fuel at our lone manufacturing site, thus exposure to this stream is negligible. To the best of our knowledge, Solutia is the only domestic manufacturer of this UVCB stream, and there are no importers.

We would request that the Agency correct its records accordingly relative to our withdrawal of intent to complete an HPV dossier on this waste stream. Please feel free to contact me at 314-674-8815 or frjoha@solutia.com if there are any questions.

Sincerely,

Frederick R. Johannsen, Ph.D.  
Solutia HPV Coordinator

cc:

Mr. Charles M. Auer (7401M)  
US EPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Mr. Steve Russell  
American Chemistry Council  
1300 Wilson Boulevard  
Arlington, VA 22209

---